

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

UNITED STATES OF AMERICA §
§
v. § NO. 6:13CR 110
§ JUDGE: LED / KNM
§
SCOTT MARTIN §

ELEMENTS OF THE OFFENSE

You are charged in Count One of the Information with Mail Fraud in violation of 18 U.S.C. §1341. The following essential elements must be proved in order to establish this offense:

1. That you knowingly created the scheme to defraud described in the Information, that is a scheme to fraudulently obtain money from Reinhart Foodservice Louisiana, L.L.C.;
2. That the false and fraudulent pretenses employed in the scheme to defraud were material;
3. That you acted with a specific intent to commit fraud; and
4. That you mailed something or caused another person to mail something through the United States Postal Service for the purpose of carrying out the scheme.

Respectfully submitted,

JOHN M. BALES
UNITED STATES ATTORNEY



L. Frank Coan, Jr.
Assistant United States Attorney
Bar No. 170966 (Georgia)
110 N. College, Suite 700
Tyler, Texas 75702
(903) 590-1400
(903) 590-1439 Fax
frank.coan@usdoj.gov